

United States District Court  
Middle District of Pennsylvania

United States  
v.  
Max Vance

No. 4:24-CR-00015

FILED  
WILLIAMSPORT

JUN 17 2025

PER NR  
DEPUTY CLERK

~~Emergency~~  
Emergency

Pro Se Motion for Temporary Release  
Pursuant to 18 U.S.C. 3142(i)

The local county prison has implemented a series of policies that make it impossible for me to prepare for trial.

I emphasize the policies that are far from universally accepted and are not adopted by numerous prisons in the United States. This emphasis highlights the unnecessary nature of these rules that are disrupting my ability to prepare for trial.

I would describe these pernicious policies as arbitrary or ~~whimsical~~ whimsical if not for the fact that they blatantly interfere with and impede a pre-trial prisoner's legal preparations. And they are rejected by a number of other secure American prisons. Best case scenario these pernicious policies are the result of a flagrant abuse of discretion, ~~forming~~ forming the over-arching woeful reality of a county prison that effectively functions as  
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a guilty plea pressure facility.

These policies include a highly prejudicial communications <sup>system</sup> that makes it needlessly difficult to communicate with lawyers and other defense experts. The improper use of prison resources to spy-on and monitor a pre-trial prisoner's legal and medical documents. An effectively unavailable notary service. The denial of adequate healthcare.

I have test results, symptoms, and a family history of illness that is consistent with being in at least the early stages of a terminal illness. This illness is the primary reason this motion is designated as an emergency motion.

My proposed release plan is to be released into the custody of my mother, Cecilia McGill or another approved person who has provided an affidavit. Then transported to a location that is the residence of an approved third party custodian or has been approved for gps monitoring.

This Temporary release will be for 30 days, to begin on July 3, 2025. I would be released into the custody of an appropriate person on July 3, 2025.

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Max Vance  
330 Pine street  
Suite 302  
Williamsport, PA 17701

Inmate Name:

May Vance

Inmate#

05743076

Lycoming County Prison

P.O Box 247

Phoenix MD 21131-0247

HARRISBURG PA 171

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District Court  
Clerk of the Court  
240 W Third Street  
Williamsport, PA, 17701

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